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January 11, 2021

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

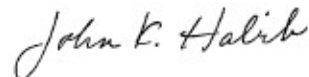
Re: Investigation by the Department of Public Utilities on its own Motion into Initiatives to Promote and Protect Consumer Interests in the Retail Electric Competitive Supply Market – D.P.U. 19-07

Dear Mr. Marini:

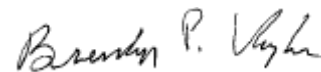
Enclosed on behalf of Fitchburg Gas and Electric Light Company d/b/a Unitil, Massachusetts Electric Company, Nantucket Electric Company, Boston Gas Company and former Colonial Gas Company each d/b/a National Grid, NSTAR Electric Company, NSTAR Gas Company, and Eversource Gas Company of Massachusetts each d/b/a Eversource Energy, The Berkshire Gas Company, and Liberty Utilities (New England Natural Gas Company) Corp. d/b/a Liberty (together the “Companies”) are the Companies’ joint comments on the proposals put forth in the Hearing Officer Memorandum issued by the Department of Public Utilities on November 19, 2020.

Thank you for your attention to this matter. Please contact me should you have any questions.

Sincerely,



John K. Habib



Brendan P. Vaughan

Enclosures

cc: Gregory Wade, Esq., Hearing Officer
Meabh Purcell, Esq. – National Grid
Carleton B. Simpson, Esq. – Unitil
R.J. Ritchie, Esq. – Liberty
Leonard Rodriguez, Esq. – Berkshire

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES

Investigation by the Department of Public Utilities)	
on its own Motion into Initiatives to Promote and Protect)	D.P.U. 19-07
Consumer Interests in the Retail Electric Competitive)	
Supply Market)	

**JOINT COMMENTS OF THE DISTRIBUTION COMPANIES ON THE DEPARTMENT
OF PUBLIC UTILITIES’ TIER ONE INITIATIVES**

I. INTRODUCTION

On January 18, 2019, the Department of Public Utilities (the “Department”) issued a Vote and Order Opening Investigation in the above-captioned docket (the “NOI”). The NOI sought input from stakeholders on initiatives to improve the retail electric competitive supply market in the Commonwealth of Massachusetts. See, NOI at 1. The NOI outlined several areas in which the Department sought stakeholder input, including Customer Awareness, Investigation into Competitive Suppliers, and Barriers to Market Efficiency. NOI at 5-12. To assist the Department in its investigation, the NOI also requested comments on twenty-one specific questions. The Department received comments from several stakeholders on these initiatives on February 19, 2019.

The Department convened a technical session on June 6, 2019, during which Department staff announced that it intended to investigate the initiatives in the proceeding in a tiered manner, with Tier One addressing initiatives that can be resolved in the timeliest manner; Tier Two addressing initiatives that require more information before the Department can determine how best to proceed; and Tier Three initiatives requiring fundamental changes to the way in which the retail competitive markets currently operate, and thus requiring significantly more discussion (see June

6, 2019 PowerPoint presentation, slides 3-4). Following several working group meetings with certain stakeholders, on February 5, 2020, the Hearing Officer issued a Memorandum (the “February 5 Memorandum”) requesting comments on certain Tier One initiatives by Thursday March 5, 2020. In addition to several other stakeholder comments, the Distribution Companies¹ submitted comments on these initiatives.

On May 22, 2020, the Department issued D.P.U. 19-07-A setting forth several initiatives related to: (1) Department review of license applications; (2) door-to-door marketing notification; (3) identification of third-party marketing vendors; (4) disclosure of product information; (5) marketing scripts; (6) recording of marketing interactions; (7) review of marketing materials; (8) automatic renewal notification and reports; (9) enrollment reports; and (10) display of municipal aggregation products on the Energy Switch MA website (Hearing Officer Memorandum, November 19, 2020 (“November 19 Memorandum”). Additionally, the Department identified several issues associated with these initiatives for discussion.

On August 6, 2020, the Department held a Zoom meeting to discuss these issues. On November 19, 2020, the Department issued the November 19 Memorandum, seeking comments on the proposals set forth during the August 6, 2020 meeting and on staff proposals related to the untimely filing of license renewal applications and customer assignment for gas customers. The Distribution Companies address each in turn below.

¹ NSTAR Gas Company, Eversource Gas Company of Massachusetts, and NSTAR Electric Company d/b/a Eversource Energy (“Eversource”), Boston Gas Company, Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid (“National Grid”), Fitchburg Gas & Electric Light Company d/b/a Unitil (“Unitil”), The Berkshire Gas Company (“Berkshire”), and Liberty Utilities (New England Gas Company) d/b/a Liberty (“Liberty”) (together the “Distribution Companies”).

II. RESPONSES TO AUGUST 6, 2020 PROPOSALS

1. Public Access to License Renewal Applications

In response to the issues raised at the August 6, 2020 Zoom meeting, the Department proposes to add information related to a licensee's corporate structure to the license renewal application (November 19 Memorandum at 3). The Department seeks comment on whether the posting of license renewal applications, including corporate structure, would pose confidentiality concerns. Additionally, Department Staff request comment on whether it would be useful to include whether the licensee is licensed to service residential customers (id. at 4).

The Distribution Companies support the Department's proposal to expand the application information to include details on a licensee's corporate structure. Currently, the application includes: (1) legal name of applicant; (2) applicant's business address; (3) website URL (optional); (4) contact information for a customer service contact person; (5) contact information for a regulatory contact person; (6) name and address of a resident agent for service of process; (7) a summary of any history of bankruptcy, dissolution, merger, or acquisition of the entity in the last year; and (8) a statement identifying whether there have been any regulatory actions taken against the applicant in any jurisdiction over the last year (November 19 Memorandum at 3-4). In addition to adding the corporate structure of a licensee, the Distribution Companies recommend expanding the time period for the summary of any history of bankruptcy, dissolution, merger, acquisition, or regulatory actions taken against the applicant above to require reporting on those items for a period of five years.

As the Department is aware, in recent years the Distribution Companies have experienced the negative ramifications of licensees defaulting or declaring bankruptcy, resulting in dropping customers with little or no advance notice, with the resultant disruption, confusion and financial

impacts for customers and the companies. To protect customers from insolvent or financially unstable suppliers, as part of the license renewal or new license application process, the Department should require that suppliers provide sufficient details of their financial history to enable the Department to make an informed decision on an application for renewal or a “new” license application submitted by an entity that became insolvent under a prior name. Under the Department’s current proposal, upon expiration of the one-year reporting period, an insolvent supplier can subsequently reorganize and re-emerge as a new competitive supplier with a new corporate name and can apply for a “new” license without documenting its previous financial difficulties. Additional details on corporate structure and on a licensee’s financial history will provide valuable information on the financial stability of licensees and should be considered by the Department at the time of license renewal.

2. Door-to-Door Marketing Notification

The Department proposed Competitive Entities² submit daily notifications with the Department and Office of the Attorney General (the “Attorney General”) two business days prior to marketing and would set a limit of five municipalities that can be identified. Additionally, Competitive Entities must identify specific neighborhoods in the City of Boston (November 19 Memorandum at 4). The Department proposes several revisions to the initiative related to: (1) notifying municipal officials; (2) implementing the municipality limit on a regional or vendor basis; and (3) applying the neighborhood requirement to additional municipalities (id.).

² The Department clarified “Competitive Entities” is defined as licensed electric and gas competitive suppliers, and licensed electricity brokers and gas retail agents (November 19 Memorandum).

A. Notification of Municipal Officials

The Department proposed that Competitive Entities should be required to notify a designated municipal official in advance of door-to-door marketing. The Department proposes that a municipality inform the Department if it would like to be notified of door-to-door marketing and provide contact information for the designated official. For municipalities that provide contact information for a designated official, a Competitive Entity would then be required to send an email to the designated official(s) of each municipality that the entity intends to door-to-door market with (1) contact information for the Competitive Entity and its third-party marketing vendor and dates of expected marketing (November 19 Memorandum at 5). Similar to the requirement to notify the Department, the municipal official would need to be notified two business days in advance.

The Department seeks feedback on the following: (1) the contact information that a municipality should be required to provide for its designated official(s); (2) the information that Competitive Entities should be required to include in their notification email to municipalities; and (3) ways in which the Department may (i) best ensure that municipalities are aware of this notification provision, and (ii) facilitate the exchange of confidential information between municipalities and Competitive Entities (November 19 Memorandum at 5).

The Distribution Companies support the Department's proposals with respect to notifications of municipal officials and should not require a municipality to provide more than a name and email address for such notifications. The notification should provide (1) contact information for the Competitive Entity and its third-party marketing vendor(s) (i.e., name, position, email address, and phone number), and (2) the date(s) of expected door-to-door marketing in the applicable municipality, as indicated in its notification to the Department, and be provided at least

two days in advance. This information is vital for municipalities for planning purposes and provides them with advance knowledge of when Competitive Entities will be soliciting in their municipality. Providing this relatively basic information should provide for sufficient notice and allow a municipality to inform residents, should any residents contact them, of the activity.

B. Five-Municipality Limit

In D.P.U. 19-07-A, the Department proposed a five-municipality limit for door-to-door marketing (November 19 Memorandum at 6). The Department seeks comment on the Competitive Entities proposal to implement the five-municipality limit on a distribution company service territory basis, rather than statewide (id.). The Competitive Entities propose a five municipality for each electric distribution company, except Unitil, and five municipalities for each gas distribution company (id.).

Further, the Department seeks comments on whether: (1) to defer consideration of the proposal until more experience is gained through the five-municipality limit on a statewide basis; (2) to condition the approach on a competitive entity using global position system to track employees and agents out for door-to-door marketing; or (3) whether five municipalities per gas service territory is appropriate (November 19 Memorandum at 7).

The Distribution Companies oppose expanding the five-municipality door-to-door marketing limit from statewide to distribution company service territory because it effectively eviscerates the requirement, by allowing competitive suppliers to conduct *electric* door-to-door marketing in 19 municipalities and *gas* door-to-door marketing in 32 municipalities on any given day. Therefore, a competitive supplier marketing both gas and electric could be in 51

municipalities on any given day.³ For perspective, under this proposal a Competitive Entity could, on any given day, conduct door-to-door marketing in *all* of Unital's service territory, and in five out of the nine municipalities served by Liberty in addition to the other Distribution Companies territories.⁴ The proposed expansion effectively vitiates the Department Staff's intention in proposing the initiative in the first place, *i.e.*, to quickly identify competitive suppliers operating in municipalities on a given day.

As noted above, the expanded approach offered by other stakeholders provides no meaningful limits. In the Department's Order in D.P.U. 19-07-A, it stated that the "Department disagrees, however, with RESA regarding the appropriateness of a fifteen-municipality limit...such a limit would not provide sufficient certainty regarding where a competitive supplier will be door-to-door marketing on a particular day."⁵ D.P.U. 19-07-A, at 22. It stands to reason that if a fifteen-municipality limit does not strike an appropriate balance, that the potential for marketing in 19 municipalities for electric and 32 municipalities for gas provides at the same time provides even less certainty regarding door-to-door activities in a particular location on a particular day. The Department struck the appropriate balance in D.P.U. 19-07-A by limiting marketing activities to five municipalities statewide, and the Distribution Companies encourage the Department to adhere to that proposal as set out in D.P.U. 19-07-A.

³ There are only 351 towns and cities in the Commonwealth. (<https://www.mass.gov/lists/massachusetts-city-and-town-websites>). If a competitive supplier is allowed to operate in 51 municipalities on any given day, that represents 14.5% of the Commonwealth.

⁴ Liberty notes that as of December 31, 2020, it has closed on the acquisition of the former Blackstone Gas Company, pursuant to the directives of the Department in its Order approving the settlement agreement filed in D.P.U. 20-03. As a result, Liberty's service territory now includes Fall River, Somerset, Swansea, Westport, North Attleboro, Plainville, and the newly acquired Blackstone, South Bellingham, and Wrentham.

⁵ "RESA" is the Retail Energy Supply Association.

C. Identification of Neighborhoods in Large Municipalities

The Department proposes to apply the neighborhood requirement, used for the City of Boston (“Boston”), to the Cities of Springfield (“Springfield”) and Worcester (“Worcester”) as well (November 19 Memorandum at 8). The Department stated it saw a large number of municipality notifications occur in Springfield in Worcester recently (id.). Further, since Springfield and Worcester are the second and third largest cities in the Commonwealth, the Department believes they should reasonably be divided (id.). The Department proposes to divide Springfield into five “door-to-door” neighborhoods (id. at 8-9). The Department divided the neighborhoods based on the following objectives: (1) the area should include neighborhoods that are contiguous; (2) the areas should be relatively equal in terms of size and population; (3) the proportion of number of areas to Springfield’s total population should be relatively equal to the proportion established for Boston; and (4) the population within an area should have similar income characteristics (November 19 Memorandum at 9).

In addition to Springfield, the Department proposes to divide Worcester into five neighborhoods for door-to-door marketing notification (November 19 Memorandum at 10). The Department proposes dividing the Worcester by its city council districts or dividing based on the neighborhoods identified by the Companies in its March 5, 2020 comments (id.). However, the Department seeks comments on combining these neighborhoods in line with the objectives identified above for Springfield (id.).

The Distribution Companies support the Department’s proposal to divide Boston, Springfield, and Worcester into neighborhoods for the purpose of door-to-door marketing notifications. Doing so balances the relative size and characteristics of each of the neighborhood areas while also recognizing that each of the three communities of Boston, Springfield, and

Worcester are a typical in their overall size compared to other communities in the Commonwealth, thereby necessitating a more discrete identification of where within the municipal boundaries' door-to-door activity may be taking place at any one time.

3. Contract Summary Form

In D.P.U. 19-07-A, the Department proposed an initiative to require a Contract Summary Form at the point of sale with key contract details (November 19 Memorandum at 10). The Department now proposes two methods of improving the Contract Summary Form by requiring the form to identify whether the voluntary renewable energy resource is located outside of the New England region and whether the product is a designated RPS Class I resource (November 19 Memorandum at 11-12). Staff proposed three forms of notifying language based on the classification of the product (id. at 12-13). If a voluntary renewable product does not meet one of the proposed definitions, the competitive supplier would need to submit it for Department review (id. at 13).

Additionally, Department staff proposes including the current and upcoming Basic Service/gas supply rate on the Contract Summary Form. The Department proposes language notifying the consumer this is a message from the Department on rates and directing the consumer to the website for additional information (November 19 Memorandum at 14-15). The Department would provide information on its Website regarding, for each distribution company: (1) the existing basic service/gas supply rates; (2) the date on which Competitive Entities must include upcoming basic service/gas supply rates on their Contract Summary Forms, and the rates to be so included; and (3) when upcoming rates are not known, the month that the upcoming rates will go into effect. Competitive suppliers would be directed to provide this information on the Contract Summary Form (November 19 Memorandum at 16).

The Distribution Companies support listing whether the resource is located outside of New England and identifying whether the product is a RPS Class I resource. Given the short time frame in which basic service rates are reviewed, approved and subsequently made effective, the Distribution Companies oppose providing prospective basic service rates on the Contract Summary form and therefore support the second version of the Department's proposed language for both gas and electric which does not provide the prospective price.

4. Recording of Telemarketing Calls

As set forth in D.P.U. 19-07-A, competitive suppliers are required to record outgoing telemarketing call for all calls over one minute and maintain a copy of the recording for a period of two years. The Department is proposing to require competitive suppliers to provide the Department with a copy of recording within three business days of a Department request (November 19 Memorandum at 16). The Department also notes it will review the possibility of real-time access to recordings as a Tier Two initiative (*id.* at 17).

The Distribution Companies support the Department's proposal to require competitive suppliers maintain records of telemarketing calls longer than one minute and to require competitive suppliers provide the Department with requested recordings within three business days. The Distribution Companies support this proposal as a vital consumer protection measure. The Distribution Companies routinely provide information requested by the Department in a timely manner and anticipate the competitive suppliers will similarly be able to provide requested materials to the Department in a timely manner.

5. Direct Mail Marketing

The Department directed competitive suppliers to submit direct mail marketing materials to the Department to review. The Department proposes to include the Attorney General on any

email it sends to a competitive supplier informing them the materials are acceptable (November 19 Memorandum at 17).

The Distribution Companies support the Department's proposal to include the Attorney General on Department emails to Competitive Entities approving marketing materials. Doing so is a simple and easy method to keep the Attorney General informed of changes to direct mail marketing materials and the Department's approval of such materials that could assist its consumer protection functions.

6. Display of Renewable Energy Products on Energy Switch

The Department proposes to post information on voluntary renewable energy content of all products exceeding the required amount by the Commonwealth regardless of whether the product is entirely RPS Class I resource (November 19 Memorandum at 17). During the August 6, 2020 Zoom meeting convened by the Department, the Department outlined in a powerpoint its proposal and position on this issue, which the Distribution Companies support (see November 19 Memorandum at 18). The Distribution Companies strive to make customers aware that New England qualified RECs are contributing to carbon reduction goals, and this presentation may help with that education.

7. Definition of Small Commercial and Industrial Consumer

The Department proposes to define a small gas commercial and industrial ("C&I") customer as a non-residential customer whose annual gas usage does not exceed 7,000 therms for purposes of the Tier I and Tier II initiatives (November 19 Memorandum at 18). For electric small C&I customers, the threshold would be a non-residential consumer whose annual electric usage does not exceed 15,000 kilowatt hours. When determining whether an electric or gas customer with multiple accounts is a small C&I customer, the Department proposes to allow Competitive

Entities to aggregate the usage of each individual account to determine whether small C&I initiatives apply (id. at 18-19). Additionally, the Department seeks comments on how to treat new gas or electric customers without historical annual usage (id. at 19).

The Distribution Companies appreciate the Department's efforts to ensure that both residential and Small C&I electric and gas customers are receiving the benefits of the Tier 1.A and Tier 1.B initiatives developed over the course of this proceeding. As the Table below illustrates, to ensure all small C&I customers receive the notices and protections under the Tier I.A. and I.B. initiatives, the threshold would have to be set at highest usage for all companies' small C&I rate classes (gas, and electric individually), even if that means the protections would extend to medium sized customers of some companies under their respective tariffs. Instead of establishing a single threshold or Small C&I definition for all companies, therefore, to ensure that all small C&I customers in Massachusetts receiving service from Competitive Entities are protected by and subject to the Tier I.A and 1.B protections, the Distribution Companies recommend defining small C&I by Company, according to each company's individual tariff. This would ensure that a small C&I customer as defined by Eversource or Liberty receives the same notice as a would a Small C&I customer as defined by Unitil. The respective definitions and limitations of Small C&I are set out below in Tables 1 and 2:

Table 1: Electric Distribution Company Definitions

Electric Distribution Company	Definition of Small C&I Customer
Eversource	Boston Rate G-1: Monthly demand <= 10 kW; secondary voltage Boston Rate G-2: Monthly demand <=199 kW; secondary voltage Cambridge Rate G-0: Monthly demand <=10 kW; secondary voltage

Electric Distribution Company	Definition of Small C&I Customer
	Cambridge Rate G-1: Monthly demand \leq 100 kW; secondary voltage South Rate G-1: Monthly demand \leq 100 kW; secondary voltage West Rate G-0: Monthly demand \leq 349 kW; secondary voltage
Massachusetts Electric	Rate Class G-1: Average use will not exceed 10,000 kWh/month or 200 kW of demand.
Nantucket Electric	Rate Class G-1: Average use will not exceed 10,000 kWh per month or 200 kW of demand.
Unitil	$<$ 850 kwh/month (average) and $<$ 4 kw demand

For gas companies, the Distribution Companies recommend the following definitions, which follow the same format:

Table 2: Local Distribution Company Definitions:

Local Distribution Company	Definition of Small C&I
NSTAR Gas Company	G-41/G-51: Less than 10,000 therms of gas per year
Eversource Gas Company of Massachusetts	G-40/G-50: Less than 5,000 therms of gas per year
Boston Gas Company (and the former Essex Gas Company and Colonial Gas Company)	Boston Gas - Based on meter size, not annual throughput: Rate G-41-B (Small C&I Low load Factor): customers whose metered use in the most recent peak period is greater than or equal to 70% of the metered use for the most recent 12 consecutive months (Sept – Aug), and whose maximum hourly meter capacity is less than or equal to 500 cubic feet per hour; Rate G-51B (Small Load Factor):

Local Distribution Company	Definition of Small C&I
	<p>metered use in the most recent peak period is less than 70% of the metered use for the most recent 12 consecutive months (Sept-Aug), and whose maximum hourly meter capacity is less than or equal to 500 cubic feet per hour.</p> <p>Former Essex Gas - based on annual usage: G-41E (Small C&I Low Load Factor) – peak usage is greater than or equal to 73% of the metered use for most recent 12 consecutive months (Sept-Aug), and whose normal annual use is 22,000 Therms or less.</p> <p>Rate G-51E (Small C&I Low Load Factor) - Peak usage is less than seventy-three (73) percent of the metered use for the most recent 12 consecutive months (Sept-Aug), and whose normal annual usage is 45,000 Therms or less.</p> <p>Former Colonial Gas- based on annual usage: Rate G-41 (Small C&I Low Load Factor) - metered use in the most recent peak period is greater than or equal to 72% of the metered use for the most recent 12 consecutive months (Sept-Aug), and whose metered annual usage is 20,000 Therms (billing units) or less.</p> <p>Rate G-51 (Small C&I Low Load Factor) - based on annual usage - metered use in the most recent peak period is less than 72% of the metered use for the most recent 12 consecutive months (Sept-Aug), and whose metered annual gas usage is 20,000 Therms (billing units) or less</p>
Liberty	8,000 therms per year
Unitil	≤ 8,000 therms per year
Berkshire	10,000 therms per year

This approach would achieve the Department's goals of protecting and notifying both residential and small C&I customers while also ensuring that all small C&I customers, as defined by the Distribution Companies, receive the requisite information to make informed decisions regarding their electric and natural gas service.

8. Other Issues

A. Untimely License Renewal Applications

The Department proposes to notify Competitive Entities 30 days prior to license renewal and would send an additional notice within five days of license renewal due date (November 19 Memorandum at 20). If a competitive supplier fails to renew within 14 days of the due date, they would be barred from enrolling new customers (*id.* at 20). If they renew within 60 days, the competitive supplier would regain the ability to enroll new customers (*id.*). If the competitive supplier fails to renew within 60 days, it would be required to petition the Department to regain the ability to enroll new customers (*id.* at 21). To enforce this prohibition, the Department proposes the Distribution Companies revise its electronic data interchange process to disable enrollment or the Distribution Companies would inform the Department if a particular competitive supplier attempted to enroll a new customer. If the competitive supplier attempts to enroll a new customer, it would be subject to licensure action (*id.*).

The Department proposes that if an electricity broker or gas retail agent fails to submit a license renewal application within 14 days of the renewal date, it would be prohibited from working with Competitive Entities to facilitate the sale of electricity or gas (November 19 Memorandum at 21). Similarly, if an electricity broker or gas retail agent renew within 60 days, it will regain its ability to work with Competitive Entities. If they do not apply within 60 days, they would be required to petition the Department (*id.*). To enforce this prohibition, the

Department would notify Competitive Entities of an electricity broker or gas retail agent that is prohibited. If the competitive supplier doesn't comply, it would be subject to licensure action (id.).

The Department requests comment on the proposal described above, in particular the enforcement mechanisms and the criteria the Department should use to determine whether to take licensure action against a competitive entity (November 19 Memorandum at 21-22).

The Distribution Companies are opposed to the Department's first suggestion for enforcing the prohibition on enrolling new customers for failure to renew a license. The Department's first method of enforcement proposes the Distribution Companies revise its electronic data interchange process to disable enrollment. This would require substantial time and financial investment on the part of the Distribution Companies to revise the existing electronic data interchange process. Further, the first method would require manual intervention by a company, which would be administratively burdensome and leave potential for human error. Based on this, the Distribution Companies support the Department's second proposal, which the Distribution Companies maintain will not require any of the costly changes or time-consuming internal efforts required by the Department's first proposal.

Additionally, the Distribution Companies request clarification on whether during the lapse of a license, a competitive supplier is prohibited from only enrolling new customers or whether the competitive supplier is also prohibited from marketing and executing contracts with new customers. In the Distribution Companies experience, many competitive supplier contracts allow for one to two months before enrollment. The Distribution Companies are concerned that during the lapse of license, a competitive supplier may continue marketing and executing contracts with new customers and intentionally delaying enrollment until the license is renewed. The Distribution Companies take no position on the proposal for brokers.

B. Customer Assignment for Gas Customers

The Department proposes to extend the rules for assignment established in D.P.U. 14-140-D to gas suppliers. Thus, a gas supplier would notify the Department, distribution company, and customer when the customer is assigned to a new competitive supplier.

The Distribution Companies support the extension of the D.P.U. 14-140-D rules to gas suppliers. While the Distribution Companies will work with gas suppliers in accordance with D.P.U. 14-140-D, the Distribution Companies reiterate that they are unable to accommodate the type of off-cycle batch enrollments described in D.P.U. 14-140, and that consistent with D.P.U. 14-140-D, they should not be required to utilize manual batch and “off-cycle” customer enrollments. As required in D.P.U. 14-140-D, the Distribution Companies will work together with competitive suppliers to avoid situations in which customers that would otherwise be assigned to a new competitive supplier are returned to basic service because the distribution companies cannot accommodate off-cycle enrollments.

III. CONCLUSION

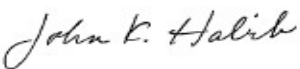
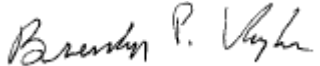
The Distribution Companies appreciate the opportunity to submit these comments on the Department's proposals in this matter and look forward to reviewing the comments of other interested stakeholders and continued participation in the remaining phases of this investigation

Respectfully Submitted,

DISTRIBUTION COMPANIES

By their attorneys,

EVERSOURCE ENERGY


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NATIONAL GRID



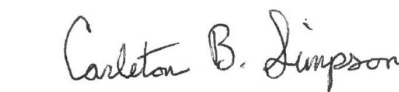
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**LIBERTY UTILITIES (NEW
ENGLAND NATURAL GAS
COMPANY) CORP. D/B/A LIBERTY**

A handwritten signature in black ink, appearing to read "R. J. Ritchie". The signature is written in a cursive style and is positioned above a horizontal line.

Ronald J. Ritchie, Esq.
Liberty Utilities
36 Fifth Street
Fall River, MA 02721

Dated: January 11, 2021